

## (Unlawful Debt Collection Practices)

1 1331, which grants this court original jurisdiction of all civil actions arising under  
2 the laws of the United States.

3 3. Defendant conducts business in the State of Oklahoma; therefore,  
4 personal jurisdiction is established.  
5

6 4. Venue is proper pursuant to 28 U.S.C. §1391(b)(2).

7 **PARTIES**

8 5. Plaintiff is a natural person residing in Oklahoma City, Oklahoma  
9 73135.  
10

11 6. Plaintiff is a “consumer” as that term is defined by 15 U.S.C. §  
12 1692a(3).  
13

14 7. Defendant is a debt collection company located at 3 Cityplace Drive,  
15 Suite 690, St. Louis, Missouri 63141.

16 8. Defendant is a “debt collector” as that term is defined by 15 U.S.C.  
17 1692 a(6), and sought to collect a debt from Plaintiff.

18 9. Defendant acted through its agents, employees, officers, members,  
19 directors, heirs, successors, assigns, principals, trustees, sureties, subrogees,  
20 representatives, and insurers.  
21

22 **FACTUAL ALLEGATIONS**

23 10. Defendant collects, and attempts to collect, debts incurred, or alleged  
24 to have been incurred, for personal, family, or household purposes on behalf of  
25

1 creditors using the U.S. Mail, telephone and/or internet.

2 11. Defendant is in the business of collecting medical debt and on  
3 information and belief was attempting to collect a debt for medical treatment  
4 incurred for personal, family, or household purposes.

5  
6 12. By way of background, beginning in or around August or September  
7 2015, Defendant began placing calls to Plaintiff's cellular telephone in its  
8 attempts to contact her daughter, Brishaun Guyton, regarding an alleged debt.

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10 13. Plaintiff's daughter does not reside with her.

11 14. Plaintiff first told Defendant to stop calling her regarding her  
12 daughter's alleged debt soon after the calls began.

13 15. However, Defendant ignored this request and continued to call her.

14  
15 16. Once Defendant was aware that its calls were unwanted there was no  
16 purpose in continuing to call Plaintiff, other than to harass her.

17 17. Thereafter, between January 2016 and continuing through November  
18 2016, Defendant placed repeated harassing telephone calls to Plaintiff's cellular  
19 telephone, often multiple times per day, seeking to collect this alleged debt.

20  
21 18. Defendant placed these calls from the numbers, including: (800)  
22 888-2238. The undersigned has confirmed that this phone number belongs to the  
23 Defendant.

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25 19. Plaintiff repeated her request for calls to cease on several occasions.



1 WHEREFORE, Plaintiff, PATRICIA THOMPSON, respectfully prays for a  
2 judgment as follows:

- 3 a. All actual damages suffered pursuant to 15 U.S.C.  
4 §1692k(a)(1);  
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6 b. Statutory damages of \$1,000.00 for the violation of the  
7 FDCPA pursuant to 15 U.S.C. §1692k(a)(2)(A);  
8  
9 c. All reasonable attorneys' fees, witness fees, court costs and  
10 other litigation costs incurred by Plaintiff pursuant to 15  
11 U.S.C. §1693k(a)(3);  
12  
13 d. Any other relief deemed appropriate by this Honorable Court.  
14 e.

15 **DEMAND FOR JURY TRIAL**

16 PLEASE TAKE NOTICE that Plaintiff, PATRICIA THOMPSON,  
17 demands a jury trial in this case.

18 RESPECTFULLY SUBMITTED,

19  
20 Dated: January 31, 2017

21 By: /s/ Joseph C. Hoeffel  
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